Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
DELETE, DELETE, DELETE	)	GN Docket No. 25-133
	)	

To: The Commission

COMMENTS OF BIBLE BROADCASTING NETWORK, INC.

Bible Broadcasting Network, Inc. ("BBN"), by its counsel, respectfully submits these comments in response to the Commission's ongoing review of its rules under GN Docket No. 25-133[1] to identify "FCC rules for the purpose of alleviating unnecessary regulatory burdens." Specifically, BBN urges the Commission to amend Title 47 CFR §74.1231(b) to eliminate the over-the-air (OTA) reception requirement for FM translators on non-reserved FM channels rebroadcasting noncommercial educational ("NCE") radio stations. This change would modernize the regulatory framework, enhance operational flexibility, and better serve the public interest by ensuring reliable delivery of NCE programming.[2]

I. Background and Current Rule

Under Section 74.1231(b), NCE FM translators operating on non-reserved channels (channels 221-300) are required to receive the signal of their primary station over the air; whereas, NCE FM translators operating on reserved channels may utilize alternative delivery methods (e.g., satellite, microwave or internet). While this requirement may have been

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[1] See *In Re: Delete, Delete, Delete*, Public Notice DA25-219, released March 12, 2025. These Comments are timely filed by April 11, 2025.

[2] BBN is licensee of 88 FM Translators, 54 of which rebroadcast BBN's NCE programming on non-reserved channels.

reasonable in an earlier era of broadcasting, it imposes unnecessary technical and economic burdens on NCE licensees, like BBN, which often operate with limited resources and frequently serve otherwise underserved communities.

II. Rationale for Eliminating the OTA Requirement

1. Technological Evolution: Modern broadcasting increasingly relies on satellite, microwave and internet-based delivery systems, which offer greater reliability and quality than OTA signals susceptible to interference, terrain challenges, and atmospheric conditions. Allowing NCE FM translators operating on non-reserved channels to use alternative delivery methods without restriction aligns the rules with current technological realities.[3]

2. Economic Efficiency: As non-profit licensees, NCE stations frequently operate on constrained budgets. The OTA requirement forces many to invest in costly equipment or infrastructure to maintain compliant signal reception, diverting funds from programming and community service. Eliminating this mandate would reduce financial strain and enable reinvestment in mission-driven content.

3. Improved Service Reliability: In rural or mountainous regions, OTA signal reception can be inconsistent or unavailable, undermining the translator's ability to rebroadcast NCE programming. Permitting flexible delivery options ensures uninterrupted service to listeners who rely on NCE stations for educational, cultural, and local content. BBN presents several examples of situations where picking up the signal of BBN's primary station over the air has become

[3] The Commission's restricting the signal delivery to OTA for NCE FM translators operating on non-reserved channels has become obsolete by the passage of time and the development of new media. With low power FM stations and NCE FM Translators operating on non-reserved channels, there is little reason to support the restriction. The original rationale was grounded in preserving the secondary role of FM translators (See Report and Order, *Amendment of Part 74 of the Commission's Rules Concerning FM Translator Stations,* 5 FCC Rcd 7212 (1990). However, in 2025, this restriction no longer serves its original purpose.

difficult.[4] BBN's off-air feeding of W241BI. Orangeburg, SC, from WYFV(FM). Cayce, SC, is often temporarily diminished by morning and evening signal ducting. Another two examples are W247AF, Sarasota, FL, and W260CA, Sebring, FL, where receiving the off-air signal of each respective full-power primary station of WYFE(FM), Tarpon Springs, FL and WYFO(FM), Lakeland, FL, are also often temporarily diminished by morning and evening signal ducting; in addition to intermittent interference mainly due to the glut of frequencies in the area making reception of the primary signal challenging. W282AE, Macon, GA, is another example where reception off-air of primary WYFK(FM) - Columbus, GA, is a challenge. In all these cases, the signal delivered to BBN's listeners would be strikingly more consistent if it could be delivered by satellite in the same manner as BBN delivers the signal to its translators that operate on reserved channels.

4. Precedent and Parity: Section 74.1231(b) already permits signal delivery to FM translators operating on reserved channels. Extending this flexibility to NCE FM translators operating on non-reserved channels promotes regulatory consistency and acknowledges their unique public service role.

III. Proposed Amendment

BBN proposes revising Section 74.1231(b) as follows:

"An FM translator may be used for the purpose of retransmitting the signals of a primary AM or FM radio broadcast station or another translator station the signal of which is received directly through space, converted, and suitably amplified, and originating programming to the extent authorized in paragraphs (f), (g), and (h) of this section. However, an FM translator providing fill-in service may use any terrestrial facilities to receive the signal that is being rebroadcast. An FM booster station or a noncommercial

[4] Nevertheless, for construction permits ("CP") for translators on nonreserved channels (where the translators are fed over-the-air and the primary signal initially appears inadequate), BBN has submitted documentation to the Commission demonstrating that the translator is able to receive the signal of the primary station specified in the relevant construction permit directly off-air, pursuant to Section 74.1231(b) in order to satisfy such conditions on the construction permit.

educational FM translator station that is owned and operated by the licensee of the primary noncommercial educational station it rebroadcasts may use alternative signal delivery means, including, but not limited to, satellite and terrestrial microwave facilities."

This amendment preserves the translator's core function—rebroadcasting the primary station's signal—while removing an outdated restriction that no longer serves the public interest.

IV. Public Interest Benefits

Eliminating the OTA requirement would empower NCE stations to deliver high-quality educational and community programming more effectively. It would reduce operational barriers, enhance signal reliability, and free resources for content creation, all of which advance the Commission's goals of promoting localism, and access to information.

V. Conclusion

The Commission should seize this opportunity to modernize Section 74.1231(b) by eliminating the OTA reception requirement for FM translators on non-reserved channels rebroadcasting NCE stations. Such a change reflects technological progress, supports the financial sustainability of NCE broadcasters, and ensures robust service to the public.

In light of the foregoing, BBN respectfully requests the Commission to take the actions set forth above.

Respectfully submitted,

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